



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

February 16, 2005

Reply to  
Attn Of: OEA-095

**MEMORANDUM**

SUBJECT: Review of Draft Preliminary Evaluation of the Implications of Airborne Asbestos Exposure Concentrations Observed During Simulation of a Selected Set of Common, Outdoor Residential Activities Conducted at the North Ridge Estates Site, Klamath Falls, Oregon

FROM: Julie Wroble  
Toxicologist

TO: D. Wayne Berman  
President, Aeolus, Inc.

Attached please find my initial comments on the above-referenced document. This document suggests that residents at North Ridge Estates should be cautious and avoid activities associated with the potential for close contact with disturbed soil. This finding is supported to some extent by site data and conservative risk analyses.

Question: Were revisions to the models made based on data gathered during the field investigation or based on mathematical manipulation of the model?

Question: Was amosite detected in the ACM fraction of any samples collected during the 2003 sampling season?

The language in the executive summary is less clear than some of the language in the subsequent sections. I think some of the findings presented in the executive summary are unclear without the backup information to support them. I would recommend limiting the size and scope of the executive summary.

I have several comments and questions as identified in the detailed comments below. In the interest of sharing this information with the community as soon as possible, I recommend an expedited review and revision of this document.

Detailed Comments:

Editorial Comment: In my printed version of the document, the tables and figure were not aligned properly on the page. Please check the print format for all tables and figures.

Throughout the text, the EPA-led, activity-based sampling study that was completed in July 2004 is referred to as a “special study” or the “EPA special study.” Please refer to this sampling exercise as the activity based sampling study or the July 2004 field event. Similarly, referring to the individuals conducting the study as “contractors” instead of “workers” is confusing.

Scientific notation: Several discrepancies were found in the text between decimal values and the corresponding scientific notation – see Section 7.1.